

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Meghan Fox, individually and on behalf of)	
all others similarly situated,)	
)	
Plaintiff,)	Case No. 2:14-CV-6404
)	
v.)	
)	
Ocwen Loan Servicing, LLC, Ocwen)	
Financial Corporation, and Cross Country)	
Home Services, Inc.)	
)	
Defendants.)	

**CONSENT MOTION TO TRANSFER VENUE
TO THE EASTERN DISTRICT OF NEW YORK**

Plaintiff Meghan Fox (“Plaintiff”) and Defendants Ocwen Loan Servicing, LLC, Ocwen Financial Corporation, and Cross Country Home Services, Inc. (collectively, “Defendants”), respectfully request that this Court transfer this action to the United States District Court for the Eastern District of New York pursuant to 28 U.S.C. § 1404(a). In support of this consent motion, the Parties state as follows:

1. This action was filed on October 16, 2014.
2. On August 6, 2013, a similar and related action was filed in the United States District Court for the Eastern District of New York, making similar allegations against Defendants Ocwen Loan Servicing, LLC, and Cross Country

Home Services, Inc., captioned *Delgado et al. v. Ocwen Loan Servicing, LLC, et al.*, Case No. 1:13-CV-4467 (E.D.N.Y.) (the “Delgado Action”).

3. In lieu of Defendants filing a motion to dismiss, stay, or transfer based on the first filed doctrine (*see Catanese v. Unilever*, 774 F. Supp. 2d 684 (D.N.J. 2011) (Walls, J.)), the Parties have consented to transfer of venue to the United States District Court for the Eastern District of New York pursuant to 28 U.S.C. § 1404(a).

4. Defendants request that this matter be transferred to the United States District Court for the Eastern District of New York as a related case to the Delgado Action.

Accordingly, for the foregoing reasons, the Parties respectfully request that this Court grant the Parties’ consent motion to transfer this action to the United States District Court for the Eastern District of New York. A proposed Order is filed herewith.

Date: January 14, 2015

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CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of January, 2015, a copy of the foregoing Consent Motion to Transfer and Proposed Order were served upon all parties and counsel of record via the Court's CM/ECF system.

/s/ Peter J. Leyh
Peter J. Leyh